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15 Attorneys for Defendant Facebook, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

18 Danielle A. Singer, Project Therapy, LLC
19 (d/b/a Therapy Threads), Holly Dean, EE
Digital LLC, and DZ Reserve, individually
and on behalf of all others similarly situated,

CASE NO. 3:18-cv-04978-JD

FACEBOOK, INC.'S RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES

Plaintiffs,

V.

Facebook, Inc.,

Defendant.

1 necessary to the prosecution or defense of this action and is not likely to lead to the discoverability
2 of admissible evidence.

INTERROGATORY NO. 2:

Identify the databases or repositories that contain the following information. For each database or repository, please identify: (1) its name, (2) its fields, (3) how it can be queried, (4) its physical location, and (5) the person who manages the database or repository:

RESPONSE TO INTERROGATORY NO. 2:

12 Facebook incorporates its General Objections as if fully set forth herein. Facebook
13 specifically objects to this Interrogatory as impermissibly compound, conjunctive, and containing
14 subparts. Subject to Rule 33(a)(1), and absent an agreement between the parties or a Court Order
15 to the contrary, Facebook considers these Interrogatories to count as 2 of the 25 interrogatories
16 permitted under Rule 33. Facebook further objects to these Interrogatories because they seek
17 confidential information, private information, and proprietary information, including trade secrets
18 and competitively sensitive business information, that is not necessary to the prosecution or
19 defense of this action and is not likely to lead to the discoverability of admissible evidence. In
20 addition, Facebook objects to the extent these Interrogatories seek information that is not relevant
21 to any claims or defenses in the case, including information about all Facebook revenues, costs,
22 and profits; data concerning the users who were included in Potential Reach, Estimated Daily
23 Reach, and Monthly Active Users; and the physical location of any database or repository.
24 Facebook also objects that these Interrogatories are overly broad, unduly burdensome and not
25 proportional to the needs of the case, including because they seek information about all databases
26 and repositories containing all information broadly related to the Facebook users who are or were
27 included in Facebook's Potential Reach, Estimated Daily Reach, or Monthly Active Users. Finally
28 Facebook objects to these Interrogatories as overly broad, unduly burdensome, not proportional to

1 the needs of the case, and not relevant to any claims or defenses in this case to the extent they seek
2 information relating to Monthly Active Users.

3 Subject to and without waiving any of Facebook's General and Specific Objections,
4 Facebook will respond to this Interrogatory, which seeks confidential information, following a
5 duly entered Protective Order. Facebook is willing to meet and confer with Plaintiffs to discuss
6 the appropriate scope of this Interrogatory, if any.

7 Dated: January 31, 2019

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